

**CHARGE OF DISCRIMINATION
MARNIE CARTER
PAGE 1**

I. Overview of Individual and Class Allegations

AK Steel Corporation has discriminated and continues to discriminate against me in the terms and conditions of my application for employment with them on the basis of my race, African-American, by denying me the opportunity to be hired while hiring equally or less qualified white employees and subjecting me to a racially hostile application process and other forms of discrimination. I believe that AK Steel Corporation's actions are part of a continuing pattern and practice of discrimination against African-American applicants for employment and employees, including but not limited to, denying applicants hiring opportunities while providing such opportunities to equally or less qualified white applicants and subjecting them to a racially hostile application process.

II. Statement of Facts

I applied to AK Steel in approximately January 2002 for a general labor position at their plant in Ashland, Kentucky. My work experience includes serving as a Forklift Operator at Ironton Iron Intermit, so I thought that I was well qualified to work in this capacity. In addition, I have no felony convictions and am drug-free. I found out about the position at a career fair in Portsmouth, Ohio at the Elks Club. An AK Steel representative there gave me an application, which I submitted at the AK Steel plant. A week later, they called to schedule me for a test given in the basement of the plant. The test asked logic, math, and general questions. I found the test to be relatively challenging and wondered why they were asking a lot of the questions because, based on my experience at Ironton Iron Intermit, much of the material tested seemed irrelevant to working in general labor. I thought that I did medium on it, well enough to have achieved a passing score. Approximately a week and a half later, I spoke with Susan Lester, an AK recruiter, on the phone. She told me that I had failed the test and refused to answer my questions or provide any further information about it.

III. Statement of Discrimination

I believe that AK Steel Corporation has discriminated against me and continues to discriminate against me in the terms and conditions of my applications for employment with them on the basis of my race, African-American, in violation of the Civil Rights Act of 1964, as amended, because white applicants with fewer qualifications than me have been hired and I have not, and because I have been subjected to a racially hostile application process and other forms of discrimination and denied the right to apply for work in an environment free of racial discrimination.

**CHARGE OF DISCRIMINATION
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PAGE 2**

I have been adversely affected by these discriminatory practices by being deprived of the equal opportunity to be hired. Such discrimination denies me and other African-Americans the right to be hired for positions for which we are qualified.

This systemic discrimination also adversely affects the status of African-Americans as employees by promoting and reinforcing racial stereotypes and bias in hiring.

IV. Statement of Classwide Discrimination on the Basis of Race

Based on my experiences, I believe that AK Steel Corporation has engaged and continues to engage in a pattern and practice of discrimination against its African-American applicants for employment and employees that denies them equal employment opportunities in ways including but not limited to the following: denying them hiring opportunities while providing such opportunities to equally or less qualified white employees and subjecting them to a racially hostile application process and work environment in which few other African-Americans are employed. This policy violates Title VII of the 1964 Civil Rights Act, 42 U.S.C. Section 2000(e), et seq.

I believe this policy has effected a class of black persons comprised of all past, present and future black applicants for employment with AK Steel. I believe that these discriminatory practices occur throughout AK Steel Corporation. I make this charge on behalf of myself and all similarly situated African-American applicants for employment and employees.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 6/14/02

Maxine Carter

Charging Party (signature)